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November 11, 2024

## Via ECF:

Judge Edgardo Ramos Thurgood Marshall United States Courthouse 40 Foley Square New York, NY 10007

RE: Cause No. 1:18-cv-03068 in the United States District Court for the Southern District of New York: *Kim Curtis v. Hilton Worldwide Holdings, Inc., et al.* 

Dear Judge Ramos,

Pursuant to this Court's Opinion & Order dated November 1, 2024, ECF No. 301, Plaintiffs hereby accept the Court's remittitur and respectfully ask that this Court enter Final Judgment that conforms to this acceptance and to the Court's Opinion & Order.

Plaintiffs previously submitted a post-verdict proposed judgment, ECF No. 269 with accompanied exhibits No.'s 269-1 and 269-2. Attached hereto, Plaintiffs submit a revised proposed judgment for the Court, which reflects the acceptance of the Court's remittitur of the punitive damages award, and which also revises the post-judgment interest rate to incorporate the Federal post-judgment interest rate pursuant to 28 U.S.C. § 1961. The post-verdict interest remains unaltered and correctly reflects the application of the New York rate of interest, which applies from the date of the verdict to the date that final judgment is entered.

Finally, pursuant to 28 U.S.C. § 1920 and Local Rule 54.1, Plaintiffs will be filing a Notice of Taxable Costs and an accompanying Bill of Costs within 30 days of the Court's entry of Final Judgment.

Yours very truly,

/s/ Jonathan D. Sneed

Jonathan D. Sneed Co-Counsel for Plaintiffs

JDS/gb

cc: All counsel of record <u>Via ECF</u>